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24 Attorneys for Plaintiff

25 **UNITED STATES DISTRICT COURT**  
26 **CENTRAL DISTRICT OF CALIFORNIA – EASTERN DIVISION**

27 **SUSAN MADAY,**  
28 Plaintiff,

vs.

COUNTY OF RIVERSIDE, a legal  
subdivision of the State of California,  
and DOES 1-10, inclusive,

Defendants.

Case No.

**COMPLAINT FOR VIOLATION OF  
FAIR LABOR STANDARDS ACT  
(29 U.S.C. § 207)  
AND DEMAND FOR JURY TRIAL**



1 2022 for this Plaintiff. Plaintiffs' claim was accordingly tolled during the pendency  
2 of that matter through July 11, 2022

3 6. Defendant COUNTY OF RIVERSIDE (hereinafter "Defendant") is a  
4 legal subdivision of the State of California, pursuant to Article 11, Section 1(a) of  
5 the California Constitution and Cal. Gov. Code § 23002.

6 7. Defendants DOES 1-10, inclusive, are sued herein under fictitious  
7 names. Their true names and capacities are unknown to Plaintiff. When their true  
8 names and capacities are ascertained, Plaintiff will amend this Complaint by  
9 inserting their true names and capacities herein. Plaintiff is informed and believes,  
10 and thereon alleges, that each of these fictitiously named defendants is responsible  
11 in some manner for the occurrences alleged herein and that the damages alleged  
12 herein were caused by such defendants.

### 13 **GENERAL ALLEGATIONS**

14 8. Throughout Plaintiff's employment with Defendant, Defendant was  
15 required under the FLSA to compensate Plaintiff for all hours worked, along with a  
16 time-and-a-half premium for all time worked in excess of forty (40) hours per week.  
17 Defendant failed to compensate Plaintiff for all hours worked as required by the  
18 FLSA.

19 9. Plaintiff is informed and believes, and therefore alleges, that at all  
20 times herein mentioned, Defendant was advised by skilled and competent  
21 employees, advisors, lawyers and other professionals knowledgeable about the  
22 requirements of the FLSA and proper procedures for the payment of overtime  
23 compensation to non-exempt employees. Plaintiff thereon alleges that Defendant  
24 knew it had a duty to compensate Plaintiff for all hours worked, including overtime,  
25 at rates required by the FLSA, and that Defendant willfully, knowingly and  
26 intentionally failed and refused to do so.





1 WHEREFORE, Plaintiff SUSAN MADAY prays for the following relief  
2 pursuant to *inter alia*, 29 U.S.C. § 216(b):

- 3 1. Judgment against Defendants for an amount equal to the overtime  
4 Defendants failed to pay at the applicable overtime rate;
  - 5 2. Liquidated damages in an additional amount equal to the overtime  
6 Defendants failed to pay at the applicable overtime rate;
  - 7 3. Attorney's fees and costs;
  - 8 4. A finding that Defendants' violations of law were willful pursuant to  
9 29 U.S.C. § 255(a), providing for an extended three-year damages recovery period  
10 preceding the date Plaintiff's executed Consent to Sue was filed in the related action  
11 *Karrene Phillips et al. v. County of Riverside*, Case No. 5:19-cv-01231;
  - 12 5. An award of prejudgment interest; and
  - 13 6. Such further relief as the Court deems just and equitable.
- 14

15 Dated: July 11, 2022

Respectfully submitted,

17 CUTTER LAW P.C.

18 By: /s/ John R. Parker, Jr.  
19 John R. Parker, Jr.

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Attorneys for Plaintiffs

### SIGNATURE ATTESTATION

I hereby attest that I have obtain the authorization from the signatories to this e-filed document and have been authorized to indicate their consent by a conformed signature (/s/) within this e-filed document.

/s/ John R. Parker, Jr.  
John R. Parker, Jr.